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March 15, 2023

VIA ECF

Hon Robert M. Levy
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: *DISH Network L.L.C. v. 786 Wireless World, Inc., et al.*,
1:21-cv-05730-AMD-RML – Joint Status Report**

Dear Judge Levy:

This firm represents Plaintiff DISH Network L.L.C. (“DISH”) in the above-captioned action. On behalf of DISH and Defendants 786 Wireless World, Inc., 786 Enterprises, Inc., Adeel Hussain, and Rana M. Afzal (together the “786 Defendants”), we write pursuant to the Court’s Order dated February 26, 2023, to provide the Court with this Joint Status Report.

On February 14, 2023, the Court issued an Order: (i) directing that by February 17, counsel for the 786 Defendants file a status report confirming that he had met with his clients and confirming their intent to comply with the Court’s discovery deadlines; (ii) directing that the 786 Defendants respond to DISH’s discovery requests by March 3, 2023, and (iii) ordering the 786 Defendants to appear for depositions on March 13 and 14. The Court also ordered that the 786 Defendants pay the costs for a deposition for which they did not appear. The Court further warned the 786 Defendants “that failure to comply with this order will most likely result in a recommendation that a default be entered against them.”

The 786 Defendants did not file a status report by February 17, 2023. On February 21, 2023, counsel for the 786 Defendants filed a letter advising the Court that his clients had failed to appear for a scheduled appointment and had not been in communication with him. Dkt. 50.

To date, the 786 Defendants have not served any responses to DISH’s discovery requests. Nor have they paid the deposition costs ordered by the Court. Counsel for the 786 Defendants has still not heard from his clients, and on March 6, 2023, he advised DISH’s counsel that the depositions scheduled for March 13 and 14 would not move forward. Counsel for the 786

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Defendants further advises that – as stated in his February 21 letter to the Court – he intends to move for withdrawal as counsel.

Since the 786 Defendants have not complied with the Court’s discovery Order (and have stated through counsel that they do not intend to appear for the depositions scheduled by the Court), DISH respectfully renews its request that the Court recommend entry of default ***judgment*** against the 786 Defendants for the reasons set forth in DISH’s prior letters, *see* Dkts. 47 and 48.

Respectfully,

DAVIS WRIGHT TREMAINE LLP

/s/ Adam I. Rich

Adam I. Rich

Copy (via ECF): All Counsel